



[00:07:53] Malene Schjoenning: Absolutely. I have the name here. I apologize for that. Um, okay, let's start again. George Papadopoulos, please raise your right hand. Do you solemnly swear or affirm that the testimony you're about to give will be the truth, the whole truth, and nothing but the truth?

[00:08:10] George Papadopoulos: I do.

[00:08:11] John DeMaio: Yes.

[00:08:12] George Papadopoulos: Yes.

[00:08:12] Malene Schjoenning: Thank-- Yes.

[00:08:14] Bradley Weitz: Okay.

[00:08:14] Malene Schjoenning: You may lower your hand, and you can begin. Thank you.

[00:08:18] Bradley Weitz: Okay. Thank-thank you, Court Reporter. Okay, so, uh, Mr. Papadopoulos, as you've been advised, we are recording this session, uh, by Zoom. This was on the deposition notice, and we'll begin now. Um, okay, first question, you understand you're under oath?

[00:08:33] George Papadopoulos: Yes.

[00:08:34] Bradley Weitz: Okay. And that being under oath means that you're sworn to tell the truth, the whole truth and nothing but the truth?

[00:08:41] George Papadopoulos: Yes.

[00:08:41] Bradley Weitz: Okay. Have you ever had a de- your deposition taken in the past?

[00:08:45] John DeMaio: Objection, next question.

[00:08:48] Bradley Weitz: You-you can make your objection, but I want him to answer. Have you ever had your deposition taken in the--

[00:08:51] John DeMaio: He's not going to answer. He's going to answer questions about this case, not his- not his litigation history. Next question.

[00:08:57] Bradley Weitz: I-I can ask about litigation history, so I'm asking the question, if you're- if you're advising your client not to, I'll bring that up to the judge. Uh, again, have you ever had your deposition taken in the past?

[00:09:07] John DeMaio: Answer it.

[00:09:08] Bradley Weitz: Yes or no.

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[00:09:08] **John DeMaio:** Answer-answer, so we can get this done.

[00:09:11] **George Papadopoulos:** Once before.

[00:09:12] **Bradley Weitz:** Okay. And what was that case involving?

[00:09:15] **George Papadopoulos:** It was a long time ago. I don't remember. I think it was just slip and fall.

[00:09:19] **John DeMaio:** Don't think. Don't guess. Just answer the question.

[00:09:22] **George Papadopoulos:** Uh, it was slip and fall.

[00:09:24] **Bradley Weitz:** Okay. So-so you don't remember or you do remember?

[00:09:27] **George Papadopoulos:** I vaguely remember, though. I remember what the case is. I don't remember any details.

[00:09:32] **Bradley Weitz:** When was- when was that, uh, last case that you had your deposition taken at?

[00:09:35] **George Papadopoulos:** I don't remember that either. It was a long time ago.

[00:09:37] **Bradley Weitz:** Okay. Do you have that information?

[00:09:40] **George Papadopoulos:** No.

[00:09:43] **Bradley Weitz:** You went to a deposition, but you don't know what it- what it was or when it was, is that what you're telling me?

[00:09:47] **George Papadopoulos:** Yes.

[00:09:49] **Bradley Weitz:** Do you know if it was approximately one year ago or five years ago?

[00:09:52] **George Papadopoulos:** It was more than five years ago.

[00:09:54] **Bradley Weitz:** Was it more than 10 years ago?

[00:09:56] **George Papadopoulos:** I don't remember.

[00:09:58] **Bradley Weitz:** Do you remember who it involved?

[00:10:01] **George Papadopoulos:** No.

[00:10:04] **Bradley Weitz:** So you-you went to a deposition. Who-- Did you have an attorney representing you at the deposition?



[00:10:09] **George Papadopoulos:** I don't remember him either. It was a long time like I told you.

[00:10:11] **Bradley Weitz:** Do you remember his name?

[00:10:13] **George Papadopoulos:** No. I can find that out. I don't remember.

[00:10:15] **Bradley Weitz:** So you don't remember-- So you had a deposition--

[00:10:16] **George Papadopoulos:** But you ask about previous things. So--

[00:10:18] **Bradley Weitz:** Excuse me. I'm going to ask the questions. I just need you to answer.

[00:10:20] **George Papadopoulos:** Okay.

[00:10:21] **Bradley Weitz:** So you had a deposition-

[00:10:22] **George Papadopoulos:** Yes.

[00:10:23] **Bradley Weitz:** -but you don't-- But you're saying now that you don't remember who your attorney was, or when it was, or what it involved, is that correct?

[00:10:29] **George Papadopoulos:** Yeah. That's correct.

[00:10:32] **Bradley Weitz:** Do you have any memory issues?

[00:10:35] **George Papadopoulos:** No, not really.

[00:10:36] **Bradley Weitz:** Do you have any medicine that you take that-

[00:10:38] **George Papadopoulos:** No.

[00:10:38] **Bradley Weitz:** -affects your memory?

[00:10:39] **George Papadopoulos:** No.

[00:10:40] **Bradley Weitz:** Okay. Um, have you ever been diagnosed with any medical issue related to memory?

[00:10:45] **John DeMaio:** Next question. I'm not- I'm not putting up with this nonsense anymore.

[00:10:47] **Bradley Weitz:** Okay, I'll-I'll strike that question. Excuse me. I'll strike that question since he already said he doesn't have memory issues. Again, tell me anything that you remember about that case where you had your deposition taken. You said it was a slip and fall. What kind of accident did it involve?



[00:11:01] George Papadopoulos: Okay, I don't remember anything. I don't remember.

[00:11:03] John DeMaio: Okay. Now, uh, come on, move on. Come on.

[00:11:05] Bradley Weitz: I'm not going to move on until I'm ready to move on. You're not going to- you're not going to- you're not going to tell me how to conduct my deposition. And you already sho-showed up late. If you want to c- if you want to--

[00:11:13] George Papadopoulos: You were late. You were late.

[00:11:15] Bradley Weitz: You showed up late. If you don't want to do the deposition-

[00:11:17] George Papadopoulos: You were late, not us. You were late. Let me--

[00:11:17] Bradley Weitz: -we'll bring it up to the judge again. Please don't interrupt me.

[crosstalk]

[00:11:20] George Papadopoulos: You were late, not us. Don't say that again. I've been here for over-- You were late.

[00:11:23] Bradley Weitz: You were here. I said-- [crosstalk] Excuse me.

[00:11:26] George Papadopoulos: All right. You got me in here. All right. Give me a second.

[00:11:27] Bradley Weitz: Your attorney knows that we've sent them three emails since eleven o'clock, and you- and-and you were not here on time. So, again, I'm going to ask you the same question--

[00:11:36] George Papadopoulos: Now, let's start from the beginning again now.

[00:11:37] Bradley Weitz: I'm going to ask you the same question.

[00:11:38] George Papadopoulos: All right.

[00:11:38] Bradley Weitz: What do you remember about the slip and fall? What kind of injuries did it involve?

[00:11:42] George Papadopoulos: It's-- I-I don't even think it was a-- Somebody fell. I-I don't-- That's all I remember.

[00:11:47] Bradley Weitz: And where did they fall?



[00:11:48] **George Papadopoulos:** I don't even remember what property it was, to tell you the truth. I have [inaudible 00:11:51] because I don't know.

[00:11:53] **Bradley Weitz:** Were you s- were you- were you- were you s- were you sued in that case?

[00:11:57] **George Papadopoulos:** What?

[00:11:58] **Bradley Weitz:** Were you sued in that case?

[00:12:03] **George Papadopoulos:** I-I don't remember.

[00:12:04] **Bradley Weitz:** You don't remember if you were a subject of a lawsuit?

[00:12:06] **George Papadopoulos:** Yes, I don't remember. It was a long time ago.

[00:12:09] **Bradley Weitz:** Have you ever been sued before?

[00:12:10] **George Papadopoulos:** No.

[00:12:12] **Bradley Weitz:** You just said you don't remember or you do remember?

[00:12:13] **George Papadopoulos:** Other than that, no, no. Other than that, no, I don't remember. I don't remember that.

[00:12:16] **Bradley Weitz:** [inaudible 00:12:16]

[00:12:18] **George Papadopoulos:** You understand the words I don't remember? How can I tell you something that I don't remember?

[00:12:23] **Bradley Weitz:** Well, I'm asking you if you've ever been sued?

[00:12:25] **George Papadopoulos:** That one time, that's it.

[00:12:27] **Bradley Weitz:** So you were sued then?

[00:12:29] **George Papadopoulos:** I don't remember. I don't remember what the case was. I don't-- I remember going to the deposition. That's it. That's all I remember.

[00:12:35] **Bradley Weitz:** But I'm just going to let you know that any of these obviously evasive answers-

[00:12:39] **George Papadopoulos:** I'm not being evasive.

[00:12:40] **Bradley Weitz:** -are going to be brought up to the court if necessary.

[00:12:42] **George Papadopoulos:** Okay.

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[00:12:43] **Bradley Weitz:** What-what court was that case filed in? State court?

[00:12:47] **George Papadopoulos:** [unintelligible 00:12:47] Boulevard, over the Sutphin-Sutphin-- What's that called? Sutphin Boulevard, something like that.

[00:12:54] **Bradley Weitz:** Sutphin Boulevard?

[00:12:55] **George Papadopoulos:** Something like that.

[00:12:56] **Bradley Weitz:** What city was-- What city did it involve?

[00:12:58] **George Papadopoulos:** Queens.

[00:13:01] **Bradley Weitz:** So was this in Queens County Court?

[00:13:05] **George Papadopoulos:** Yes. Uh--

[00:13:06] **John DeMaio:** He said, yes. That's it. Wait for the next question. Don't volunteer. Just answer the question.

[00:13:14] **Bradley Weitz:** My question was--was, did this take place in Queens County Court? He said that it involved Sutphin Boulevard, Queens. I'm not sure what-- [crosstalk]

[00:13:20] **George Papadopoulos:** If that's where it occurred, that's what it--

[00:13:21] **Bradley Weitz:** I don't know if that's where the accident took place?

[00:13:23] **George Papadopoulos:** I remember the address. I don't remember what kind of-- Probably, I guess it was Queen-Queens County Court. What else would it be?

[00:13:28] **Bradley Weitz:** Okay. And were you being sued there, or you don't remember if you were being sued there?

[00:13:32] **George Papadopoulos:** I don't remember what the deposition was exactly.

[00:13:34] **Bradley Weitz:** I'm sorry, you got cut off. Can you-- [crosstalk] You're-- you're talking when I'm speaking, so, i-i-- I cannot hear you. So let me finish-- let me finish this sentence and then you'll answer. The question again, in-in this-- in this case that it was-- that involved, uh, the courthouse in Queens, were you sued?

[00:13:53] **George Papadopoulos:** I don't remember. I can tell you yeah, but I-I mean, I don't remember. I don't remember the details.

[00:13:59] **John DeMaio:** We're not going to have the same questions again.



[00:13:59] **Bradley Weitz:** Then what was the pur- then what was the purpose--

[00:14:02] **John DeMaio:** Mr. Weitz, I'm not going to have the same questions more than once. Move on to the next question. I will object--

[00:14:06] **Bradley Weitz:** You can state your objections to the record as much as you want.

[00:14:09] **George Papadopoulos:** Okay.

[00:14:09] **Bradley Weitz:** No problem.

[00:14:10] **George Papadopoulos:** That's all. When I say, objection, he's not to answer. Next question.

[00:14:14] **Bradley Weitz:** So you're advising your client not to answer about that lawsuit?

[00:14:17] **John DeMaio:** Next question.

[00:14:18] **George Papadopoulos:** Next question.

[00:14:19] **Bradley Weitz:** No, I'm going to ask the same question. If you want to specifically advise him to do that, it will be on the record, and I'll-I'll bring that up to the judge. I'm going to ask you a question about this lawsuit. What were you deposed about in that lawsuit?

[00:14:30] **George Papadopoulos:** I don't remember.

[00:14:35] **Bradley Weitz:** Who else was involved in that lawsuit?

[00:14:37] **George Papadopoulos:** I don't remember. It was a long time ago, I told you.

[00:14:41] **John DeMaio:** Just say, "I don't remember" and stop. Don't give any-- Only answer the question.

[00:14:45] **Bradley Weitz:** Please don't- please don't advise your client what answer to answer.

[00:14:48] **John DeMaio:** I'll do whatever I deem appropriate, Mr. Weitz. Next question.

[00:14:52] **Bradley Weitz:** Wait-wait. So you- you're advising your client to say- just to say, "Don't remember." Is that correct?

[00:14:56] **John DeMaio:** I'm not advising-- That way, you're a thorough liar. I told him, "Answer the question and nothing else." That's not telling him what to answer.

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[00:15:04] Bradley Weitz: Well, this is recorded, so we got that. Don't worry. Now, you just called me a liar?

[00:15:09] John DeMaio: Yes.

[00:15:12] Bradley Weitz: A thorough liar.

[00:15:14] John DeMaio: Correct. You said that I told him what to say. That is a lie, and you know it. Next question.

[00:15:19] George Papadopoulos: And you accused us of being late, and you know that too.

[00:15:23] Bradley Weitz: Uh, you-- There-there's multiple emails that were sent to your counsel. You preview that with your counsel after the fact that nobody showed up on time.

[00:15:29] George Papadopoulos: We get you, my friend.

[00:15:31] Bradley Weitz: I'm going to continue my questioning, and please do not interrupt me, because we-we- we're going to be here for at least four hours, and we'll probably continue to seven hours. So please don't interrupt me.

[00:15:40] George Papadopoulos: It's fine.

[00:15:42] Bradley Weitz: Again, with regard to that lawsuit, you said you had a deposition, where did that deposition take place?

[00:15:48] George Papadopoulos: Sutphin Boulevard.

[00:15:50] Bradley Weitz: No, you said that's where the courthouse was. Where did the de-deposition take place?

[00:15:54] George Papadopoulos: That's the deposition. I didn't go to court. That's right. Now I remember exactly. I didn't-- I went to a deposition. That's it. There was no courthouse. It was in a room like this.

[00:16:02] Bradley Weitz: Okay. Tell me what you recall about the deposition then.

[00:16:04] George Papadopoulos: That's all I remember. I remember there was three lawyers in front of me. That's all I remember. I don't remember what I said, what happened, what it was about. I don't remember anything.

[00:16:13] Bradley Weitz: And you don't remember if you were even sued?

[00:16:17] George Papadopoulos: [sighs]



[00:16:18] **John DeMaio:** Next question. That has been asked. He said, "I don't remember."

[00:16:19] **George Papadopoulos:** I don't remember. I really don't remember. I really don't remember, man.

[00:16:21] **John DeMaio:** You're not going to ask the same question more than once, Mr. Weitz.

[00:16:23] **George Papadopoulos:** I don't remember the details, so I'm not going to answer something that I don't remember and-and make a mistake.

[00:16:28] **John DeMaio:** Okay. When I say objection, stop talking.

[00:16:30] **George Papadopoulos:** All right.

[00:16:30] **John DeMaio:** The next question, Mr. Weitz. Don't ask the same questions more than once.

[00:16:33] **Bradley Weitz:** That wasn't the same question. Are you advising your client to stop talking?

[00:16:39] **John DeMaio:** Another dishonest comment.

[00:16:40] **Bradley Weitz:** You just stated, "Stop talking." All right, I'm asking you. I want to be clear. Are you advising your client to stop talking?

[00:16:45] **John DeMaio:** When I say objection, he's not to speak.

[00:16:48] **Bradley Weitz:** Okay. Are you-- Ca-can he still continue talking, or you're telling him to stop talking now?

[00:16:53] **John DeMaio:** I've never told him to stop talking. Another lie.

[00:16:55] **Bradley Weitz:** You did say it. It's recorded. But nonetheless, I'm glad that you don't mean it. So I will continue asking the question. Do you recall the outcome of that case, if it went to trial?

[00:17:07] **George Papadopoulos:** No.

[00:17:09] **Bradley Weitz:** Were you involved in a trial?

[00:17:11] **George Papadopoulos:** No.

[00:17:12] **Bradley Weitz:** Were you involved in any settlement agreement?

[00:17:14] **George Papadopoulos:** No.



[00:17:16] **Bradley Weitz:** So you were not a party to any settlement agreement in this case we're talking about?

[00:17:19] **John DeMaio:** Objection. Has been answered. Next question.

[00:17:25] **Bradley Weitz:** Were you a plaintiff in that lawsuit?

[00:17:28] **George Papadopoulos:** No.

[00:17:30] **Bradley Weitz:** Were you a witness in that lawsuit?

[00:17:34] **George Papadopoulos:** I don't know. I don't remember.

[00:17:36] **Bradley Weitz:** Where did the slip and fall take place?

[00:17:39] **George Papadopoulos:** I don't remember that either. I told you that before.

[00:17:42] **Bradley Weitz:** Did it involve any of your properties that you own?

[00:17:44] **George Papadopoulos:** I'm sure it did, but I don't know which one. I don't remember which one.

[00:17:51] **Bradley Weitz:** You're sure it did, but you don't know which one?

[00:17:54] **George Papadopoulos:** Yes.

[00:17:54] **Bradley Weitz:** Where-- Who can I speak to to find out more information about that lawsuit-

[00:17:58] **George Papadopoulos:** I don't know.

[00:17:58] **Bradley Weitz:** -with regards to the request?

[00:18:00] **George Papadopoulos:** I don't know.

[00:18:02] **Bradley Weitz:** Who was your attorney then?

[00:18:04] **George Papadopoulos:** I don't remember. It was a long time ago.

[00:18:07] **Bradley Weitz:** Okay. Do you have the records?

[00:18:09] **George Papadopoulos:** Pardon me.

[00:18:10] **Bradley Weitz:** Do you have the records in your office?

[00:18:12] **George Papadopoulos:** I don't have an office.

[00:18:15] **Bradley Weitz:** Do you have the records in any--

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[00:18:16] George Papadopoulos: I checked my home and I didn't find anything.

[00:18:18] Bradley Weitz: Excuse me. Let me finish my question before you answer.

[00:18:20] George Papadopoulos: I was trying to answer your question.

[00:18:21] Bradley Weitz: Let me finish my question before you answer, please. Do you have the records in any location-

[00:18:26] George Papadopoulos: I checked-

[00:18:26] Bradley Weitz: -that you have access to?

[00:18:28] George Papadopoulos: I checked my home and I didn't find anything.

[00:18:31] Bradley Weitz: I didn't ask you about-- How would you check your home if I didn't ask you about this before?

[00:18:36] George Papadopoulos: I checked my home for any kind of paperwork pertaining to-to anything coming today. I didn't find anything because I didn't have anything. I don't have an office. I work out of my home.

[00:18:46] Bradley Weitz: Again, I asked you if you have any records pertaining to this lawsuit, which prior to a few minutes ago, I had no-no-no information about, so I would ask you--

[00:18:52] George Papadopoulos: [unintelligible 00:18:53]. No, I don't.

[00:18:54] Bradley Weitz: Excuse me. Don't answer until I'm done talking, please. I never asked you about this. And please don't answer until I'm done talking. I cannot hear you while I'm talking.

[00:19:02] George Papadopoulos: Okay.

[00:19:02] Bradley Weitz: I had never asked you about this lawsuit before because this is the first time I hear about it. So you checking your home beforehand would-would-would not- would not be a logical timeframe. So I'm asking you, do you have any records of this in your home or any other location that you have access to, this lawsuit?

[00:19:19] George Papadopoulos: No, I do not.

[00:19:24] Bradley Weitz: And do you have financial records that relate to it, paying your attorney, for example?

[00:19:27] George Papadopoulos: No.



[00:19:32] **Bradley Weitz:** Was this indicated in any past tax return, anything dealing with this lawsuit?

[00:19:38] **George Papadopoulos:** Nope.

[00:19:42] **Bradley Weitz:** All right. We're going to continue forward. We'll, uh, we'll-we'll get to that in discovery. Okay. So next question. You understand that the responses here are the same force as in a courtroom with a judge or jury-

[00:19:58] **John DeMaio:** Objection. Stop instructing the witness.

[00:19:58] **Bradley Weitz:** -under penalty of perjury?

[00:20:00] **John DeMaio:** Stop instructing the witness and just ask questions.

[00:20:03] **Bradley Weitz:** This is a question. I asked him if he understands that.

[00:20:05] **John DeMaio:** Okay. Uh, okay. Next question. He understands that he's--

[00:20:09] **Bradley Weitz:** I'm-I'm-I'm going to ask the question and have it answered. You're not going to tell me, "Next question," well, until I'm done with one question at a time. I asked you if you understand-

[00:20:17] **George Papadopoulos:** Yes, I do.

[00:20:18] **Bradley Weitz:** -that your deposition here has the same force as if- as in a courtroom with a judge and jury under the penalty of perjury. Yes or no?

[00:20:27] **George Papadopoulos:** Yes.

[00:20:28] **Bradley Weitz:** Are you- are you prepared to answer my questions today?

[00:20:33] **John DeMaio:** Objection. Next question. He's-he's going to answer the question. Mr. Weitz, I'm growing very tired of this nonsense.

[00:20:39] **Bradley Weitz:** Uh, again, are you prepared to answer my questions today? Unless you advise him not to answer, I'm going to a-ask for that answer.

[00:20:46] **John DeMaio:** Yeah, he's here to answer the questions. Next question, I'm not going--

[00:20:49] **Bradley Weitz:** You're not- you're not to answer for him. Excuse me, Mr. DeMaio, you're not the deponent. Now, again, you just- you just answered for him at 11:30 AM. And that is- that is not appropriate. I'm asking the question to the deponent, not you. So are you advising him not to answer that question?

[00:21:06] **John DeMaio:** Yes.

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[00:21:07] **Bradley Weitz:** Or can he-- Or can I-- Do you need me to repeat the question? The question again is, are you prepared to answer my questions today? Yes or no.

[00:21:14] **John DeMaio:** Next question.

[00:21:15] **Bradley Weitz:** No, excuse me. I need the deponent to answer on the record.

[00:21:20] **John DeMaio:** No.

[00:21:21] **Bradley Weitz:** Yes or no.

[00:21:22] **John DeMaio:** Next question. He won't answer when I say objection.

[00:21:27] **Bradley Weitz:** So are you advising him not to answer? I need that-- I need to know that.

[00:21:30] **John DeMaio:** Uh, for clarity, Mr. Weitz, and I don't understand this. Apparently, you're having a problem with English. When I say objection, he is always directed not to answer. You don't have to keep asking that.

[00:21:40] **Bradley Weitz:** That's not how we work in depositions, Mr. DeMaio.

[crosstalk]

[00:21:43] **John DeMaio:** Oh.

[00:21:43] **Bradley Weitz:** Mr. DeMaio, you-you can object for the record. You have to say objecting. If you don't want him to answer, you just say objecting and I direct the- I direct the deponent not to answer.

[00:21:51] **John DeMaio:** I'm not going to do that. Objection means you don't answer.

[00:21:53] **Bradley Weitz:** Okay. So your objection is noted for the record, and I'm asking him to answer the question. Are you prepared to answer my questions today? Yes or no.

[00:22:00] **John DeMaio:** Objection.

[00:22:05] **Bradley Weitz:** Are you refusing to answer?

[00:22:07] **John DeMaio:** Objection.

[00:22:07] **Bradley Weitz:** Because your-your-your attorney has not directed you not to answer according to what I see here.



[00:22:12] John DeMaio: Okay. So let's do it one last time. Whenever I say the word objection, the client is directed not to answer. Let me do it again. Whenever I say objection, the client is directed not to answer. When I say, objection, the client is directed not to answer. [crosstalk] So you don't have to keep asking whether he's directed not to answer.

[00:22:30] Bradley Weitz: Then I'll be- I'll be very clear. If you don't answer my questions, and this does not involve attorney-client privilege, and you're directing your client by saying the word objection, not to answer, then I am going to cease the deposition and seek contempt orders from the court. So I'm going to be very clear about that. So I'm asking you the question one more time, and then you can make your objection. If you choose to tell him not to answer, then I will cease the deposition, and I will go straight to the judge today, and I will ask for sanctions of contempt. So, again, my question is, are you prepared to answer my questions today?

[00:23:00] John DeMaio: Objection.

[00:23:01] Bradley Weitz: Yes or no? I didn't hear you.

[00:23:05] John DeMaio: Objection.

[00:23:07] Bradley Weitz: So that means by saying objection as you just defined it, that means you're directing your client not to answer. Is that correct? Mr. DeMaio, is that correct? [silence] And I-- And-and I'm going to wait one minute to get an answer to my question if you- if that is not correct. And if I don't get an answer, I'm going to stop the deposition now, and I'm going to make the motion.

I'm confirming with you now I'm making the motion to the court, for first, you called me a thorough liar on the deposition. Your client has been very evasive, not remembering almost anything. You're-you're-- You told me to stop. You told your client to stop talking. You answered for the client to say, "I don't remember." And now you are making objections, which you defined at 11:31 AM to me, that it also tells your client not to answer.

So I'm going to wait one minute, and if I don't get an answer for that, or if I don't get a response from you, Mr. DeMaio, when I ask you the question if you're advising your client not to answer, I'm going to cease the deposition, and I'm going to go and ask for, uh, instruction from the court how I can compel the deposition perhaps in front of a-a magistrate judge.

[00:24:20] John DeMaio: If you stop the deposition, it will be concluded and waived.

[00:24:25] Bradley Weitz: It will not be. And-and we will-- We will pause the deposition for me to do so. And I will follow the individual rules of the magistrate. Perhaps, you might want me to call him. I will see what the magistrate requires, but I'm not going to have you speaking for the client. I'm not going to have you telling the



client, unless it's attorney-client privilege, not to answer questions like if he prepared for the deposition. And I'm not going to have you **[unintelligible 00:24:45]** calling me, what is, uh, uh, very, uh, derogatory terms during the deposition.

[00:24:55] John DeMaio: Ask your next question.

[00:24:56] Bradley Weitz: No, I-I'm waiting for the answer to that one. And then I'm going to pause it, and I'm going to go to the court, and I will see if the judge wants me to write a letter or call him. Okay, I've now waited over a minute. So I am now going to put the deposition on hold. It's now 11:34 AM, and I will contact the court. If you'd like to be on that call-- Uh, well, first I'm going to review his individual rules, then if necessary, contact the court, and if not, I'll make the motion just straight to the judge for your non-compliance, which is, uh, I-I-- We've already addressed the non-compliance in the, uh, recent motion that we filed just a few days ago with regard to other discovery issues.

So I'm pausing the deposition now. You're welcome to stay on here, or you're welcome to log off, and I will email you once I- once I get direction, how are we going to proceed.

[00:25:45] John DeMaio: [crosstalk] concluded and the deposition is waved.

[00:25:47] George Papadopoulos: Bye.

[00:25:48] Bradley Weitz: Absolutely not.

[pause 00:25:50]



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